the display information to the CPE (Tessler, col. 4, lines 1-6). Clearly, Tessler teaches a system for **displaying** information. Such a conclusion is further substantiated by the title of Tessler, "Delivery Of Display Information To The Caller In An Advanced Intelligent Network."

It is acknowledged within the Office Action that Tessler does not disclose a text-to-speech converter configured to convert a selected text name into an audible name. However, it is stated within the Office Action that Tessler discloses a customer premises equipment display manager (CPE 202) configured to deliver the called party's name to the calling party, and that Tessler further suggests that this delivery could be an audible indication. It is further stated within the Office Action that since a text-to-speech converter is well known in the art, the text-to-speech converter can be integrated into the CPE display manager of Tessler for performing the suggested audible indication. The Applicants respectfully disagree with this conclusion.

Tessler does not suggest that the delivery of the display information can be via audible means. The Office Action cites column 9, line 60 of Tessler to support the assertion that Tessler suggests audible delivery of the display information. Column 9, line 69 of Tessler states "[t]he capability for AIN services to provide both display and audible indications to the caller can be used by those skilled in the art to implement several services." An "audible indication" is not the same as audibly presenting the display information. In fact, there is no explicit explanation within Tessler as to the meaning of "audible indication." However, it is suggested within Tessler that an audible indication is a predefined sound or message, such as an announcement or a tone (Tessler, col. 9, line 56 and lines 8-10). There is no hint, teaching or suggestion within Tessler to indicate that the audible indication can be an audio message *resulting from the text-to-speech conversion* of a text message.

Further, there is no hint, teaching or suggestion within Tessler to integrate a text-to-speech converter within the CPE display manager as suggested in the Office Action. In fact, adding a text-to-speech converter to the CPE display manager of Tessler is beyond the scope of Tessler. Tessler very clearly and explicitly teaches a system for **displaying** information. Visual display and text-to-speech conversion are very different technologies. The display system of Tessler is explicitly designed to display information. In addition to the aforementioned CPE display manager and the local central office display software, Tessler teaches a response processor to provide the local central office display software with the information to be displayed and the format (Tessler, col. 4, lines 48-55), and the display software uses a signaling path

between the local central office and the CPE to deliver the display information to the caller (Tessler, col. 4, lines 56-58). Tessler does not teach, or even suggest, a mechanism by which the display information is converted to speech and audibly presented to the caller.

Within the Office Action, it is stated that it would be obvious to one skilled in the art to use a text-to-speech converter, as integrated within the CPE display manager of Tessler. The Applicants contend that even if such an integration is within the scope of Tessler, such an integration is not obvious. As stated in the present application, there is a need for audibly identifying a call recipient to the caller. Looking at a display screen is often inconvenient and sometimes not possible due to screen limitations, lighting environment of the screen, and/or user eyesight limitations (Specification, Page 2, lines 1-4). Such display screen limitations are the catalyst for the present application. As both display screens and text-to-speech converters have been in use for many years, if integrating a text-to-speech converter within the CPE display manger of Tessler were obvious as suggested within the Office Action, then the suggested integrated CPE display manager and text-to-speech converter would have previously been devised.

It is only through hindsight, that is, having knowledge of the Applicants' invention, that led to the combination as suggested within the Office Action. But for this knowledge, the combination as such would not have occurred to the Examiner, as it did not occur to those skilled in the art to make the asserted combination. In other words, the combination proposed within the Office Action is being made only in light of knowledge of the Applicants' disclosure.

Claim 1 teaches an audible confirmation system for allowing a calling party to audibly hear an audible name of a call recipient. The audible confirmation system includes a database, a control point and a text-to-speech converter. The text-to-speech converter is configured to convert a selected one of a plurality of text names stored in the database into the audible name. As acknowledged within the Office Action, Tessler does not teach the use of a text-to-speech converter. As discussed above, Tessler neither explicitly teaches a system capable of using a text-to speech converter nor implicitly indicates a system capable of functionally integrating a text-to-speech converter within its display system. Further, there is no hint, teaching or suggestion within Tessler to suggest the integration of a text-to-speech converter with the display system as suggested within the Office Action. For at least these reasons, the Applicants respectfully submit that the subject matter of the independent Claim 1 is allowable over the

teachings of Tessler and as such is an allowable base claim.

Claims 2 and 3 are each dependent upon the independent Claim 1. As discussed above, Claim 1 is allowable over the teachings of Tessler. Accordingly, Claims 2 and 3 are each also allowable as being dependent upon an allowable base claim.

Claim 4 teaches a method of allowing a calling party to audibly identify a call recipient. The method of Claim 4 includes converting the text name of the call recipient to an audible name. Similar arguments, as discussed above in regards to Claim 1, apply to independent Claim 4. Therefore, the independent Claim 4 is allowable over the teachings of Tessler and as such is an allowable base claim. Claims 5 and 6 depend from independent Claim 4. Accordingly, Claims 5 and 6 are also allowable as being dependent upon allowable base claims. Therefore, the Applicants respectfully request reconsideration and further examination of Claims 1-6.

Within the Office Action, Claims 7-10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tessler in view of U.S. Patent No. 4,625,081 issued to Lotito et al. (hereinafter "Lotito"). The Applicants respectfully traverse this rejection.

Lotito relates to an automated telephone voice service system. Lotito includes a data store to store and retrieve voice messages at individually addressable message baskets, and a control system for selectively coupling the data store to a telephone network. The control system is responsive to different data signals received from the telephone network to associate a particular telephone line to a particular message basket. Once associated, a voice message can be received over the telephone line and stored in the message basket, where the stored voice message can later be forwarded to another message basket. Lotito does not teach the use of a text-to-speech converter, nor does Lotito teach converting a text name to an audible name.

Claim 9 teaches a method of allowing a calling party to audibly identify a call recipient. The method of Claim 9 includes converting the text name of the call recipient to an audible name. Within the Office Action, it is stated that Tessler teaches converting the text name of the call recipient to an audible name. Similar arguments, as discussed above in regards to Claim 1, apply to independent Claim 9. Specifically, Tessler neither explicitly teaches a system capable of using a text-to speech converter nor implicitly indicates a system capable of functionally integrating a text-to-speech converter within its display system. Further, there is no hint, teaching or suggestion within Tessler to suggest the integration of a text-to-speech converter with the display system as suggested within the Office Action. For at least these reasons, the

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Applicants respectfully submit that the subject matter of the independent Claim 9 is allowable over the teachings of Tessler, Lotito and their combination and as such is an allowable base claim.
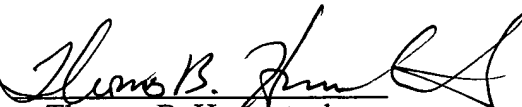
Claims 10-14 are each dependent upon the independent Claim 9. As discussed above, Claim 9 is allowable over the teachings of Tessler, Lotito and their combination. Accordingly, Claims 10-14 are each also allowable as being dependent upon an allowable base claim.

Claims 7 and 8 are each dependent upon the independent Claim 4. As discussed above, Claim 4 is allowable over the teachings of Tessler. Accordingly, Claims 7 and 8 are each also allowable as being dependent upon an allowable base claim. Therefore, the Applicants respectfully request reconsideration and further examination of Claims 7-14.

For at least the reasons given above, Applicants respectfully submit that all of the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: 1-21-03

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